

**Federal Defenders
OF NEW YORK, INC.**

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August 1, 2023

By ECF

The Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Christian De La Torre Villalvazo
20 Cr. 584 (CM)**

MEMO ENDORSED

8/2/23

Surrender extended to
Sept. 11, 2023.

Colleen McMahon

Dear Judge McMahon:

With the consent of the Government, I write to request an extension of Mr. De La Torre's surrender date from August 7 to September 11. As the Court is aware, Mr. De La Torre's wife is pregnant and expecting their third child. His wife's next doctor's appointment is on August 29. At this appointment, she will be informed of the gender of their child. Mr. De La Torre would like to accompany his wife to this critical appointment.

Additionally, I request an extension given Mr. De La Torre's recent designation to a Bureau of Prisons facility 10 hours away from his family. On Friday, July 28, Mr. De La Torre was designated to USP LOMPOC which is located at 3901 Klein Blvd, Lompoc, CA 93436. USP Lompoc is 645 miles away from his family in Tucson— 10 hours by car and bout 1.5 hours by plane. An extension would allow Mr. De La Torre additional time to be present with his pregnant wife and children before he surrenders to the distant facility. An extension would also provide Mr. De La Torre with additional time to arrange his travel to Lompoc. As mentioned, Mr. De La Torre informed of the designated facility on July 28 for a surrender date of August 7. As noted above, the Government consents to this request for an extension.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
917-612-2753 (c)

cc: AUSA Ni Qian
AUSA Elizabeth Espinosa

